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 Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

\* \* \*

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; et al,  
 Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Stipulation and Order to Extend Deadline for  
 Response and Reply to Defendants Michael  
 York Motions to Dismiss (ECF No. 59)

[Third Request]

Pursuant to Local Rule 6-1, Plaintiff Julie Danou Hanna (“Plaintiff”) and Defendant Michael York (“Defendant”), by and through their undersigned counsel, hereby stipulate to a four (4) week extension of Plaintiff’s deadline to file an Opposition to Defendant Michael York’s Motion to Dismiss (ECF No. 59) and Defendants’ deadline to file a Reply to Plaintiff’s Opposition, as follows:

|                                 | Old Deadline   | New Deadline |
|---------------------------------|----------------|--------------|
| Plaintiff’s Opposition Deadline | April 21, 2022 | May 19, 2022 |
| Defendant’s Reply Deadline      | April 28, 2022 | May 26, 2022 |

This is the third request for an extension of these deadlines. The requested extension is sought in good faith and not for purposes of undue delay.

**GOOD CAUSE FOR EXTENSION OF DEADLINES**

This extension is necessitated by the withdrawal of Plaintiff's counsel Kathryn Black from this matter. Ms. Black was the lead attorney representing Plaintiff in the absence of Nicole Diaz, who is out on extended leave. Gilbert Employment Law P.C. is actively working to reassign Ms. Black's case duties and responsibilities, which include preparing Plaintiff's Opposition to the Motion to Dismiss filed by Defendant York. However, the firm is currently facing staffing shortages due to a number of employees being out on medical or other leave. A four-week extension would allow Plaintiff's counsel to reassign Ms. Black's responsibilities appropriately and with consideration for the staffing shortages as well as the heavy litigation schedule faced by the remainder of Plaintiff's counsel over the next few weeks.

Respectfully submitted,

DATED 4/15/2022

/s/ Gary Gilbert  
 Gary M. Gilbert, Esq.  
*Pro Hac Vice*  
 Attorney for Plaintiff

/s/ Mitchell Bisson  
 Mitchell Bisson, Esq.  
 Nevada Bar No. 11920  
 Attorney for Defendant

**ORDER**

IT IS SO ORDERED.

  
 UNITED STATES DISTRICT JUDGE

April 18, 2022  
 Dated: \_\_\_\_\_.

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